

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
(Pittsburgh)

IN RE:)	
)	Bankruptcy No. 20-22898-CMB
RONALD G. LINABURG)	
)	Chapter 11
)	
Debtor)	
)	
_____)	
)	
RONALD G. LINABURG,)	
)	
Movant,)	
)	
vs.)	
)	
FIRST NATIONAL BANK OF)	
PENNSYLVANIA)	
)	
)	
_____ Respondent/Debtor.)	

ANSWER TO DEBTOR’S OBJECTION TO PROOF OF CLAIM NO. 3

AND NOW, comes First National Bank of Pennsylvania (the "**Bank**"), by and through its attorneys, Donna M. Donaher, and hereby files this Answer to Debtor’s Objection to Proof of Claim No. 3 (the “Answer”), and in support thereof, Bank respectfully states the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.

8. Admitted.
9. Denied. The Motion speaks for itself.
10. Admitted.
11. It is admitted only that the Respondent has not yet amended the Claim. Although the Bank has been marketing the Property for sale, the Bank has yet to complete a sale. Presently, the Property is under an Agreement of Sale of sale dated March 1, 2022. The Agreement of Sale contains a 180 day zoning approval contingency. The estimated closing date is October 30, 2022. If the requested zoning approval is not granted, the buyers have the right to terminate the Agreement of Sale.

WHEREFORE, First National Bank of Pennsylvania requests that this Court enter an Order denying the Debtor's Objection to Proof of Claim No. 3.

Respectfully submitted,

Dated: June 15, 2022

By: /s/ Donna M. Donaher
Donna M. Donaher, Esquire
Pa. I.D. No. 53165
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First National Bank of Pennsylvania
100 Federal Street, 4th Floor
Pittsburgh, PA 15212
(412) 320-2191

Attorneys for First National Bank of Pennsylvania

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ORDER OF COURT

AND NOW, this _____ day of _____, 2022, upon consideration of the Answer to Debtor's Objection to Proof of Claim No. 3, filed by First National Bank of Pennsylvania, it is hereby ORDERED, ADJUDGED and DECREED that the Debtor's Objection to Claim No. 3 is DENIED.

BY THE COURT:

The Honorable Thomas Bohm
United States Bankruptcy Court

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CERTIFICATE OF SERVICE

I certify that on June 15, 2022, I served or caused to be served a copy of the foregoing Answer to Debtor's Objection to Proof of Claim No. 3, upon each of the persons and parties in interest shown below either by first class mail, postage prepaid or by email:

Debtor

Ronald G. Linaburg
924 Valleyview Road
Pittsburgh, PA 15243

Debtor's Counsel

Brian Thompson, Esquire
Thompson Law Group
125 Warrendale Bayne Road, Suite 200
Warrendale, PA 15086

Trustee

Jodi Hause, Esquire
Suite 960, Liberty Center
1001 Liberty Avenue
Pittsburgh, PA 15222

Dated: June 15, 2022

By: /s/ Donna M. Donaher
Donna M. Donaher, Esquire, Pa. I.D. No. 53165

100 Federal Street, 4th Floor
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